

Federal Defenders OF NEW YORK, INC.

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Southern District of New York Jennifer L. Brown Attorney-in-Charge

March 9, 2022

VIA ECF

The Honorable Edgardo Ramos United States District Court Southern District of New York 40 Foley Square New York, NY 10007

> RE: <u>United States v. Alton Barnes</u> 22 Cr 109 (ER)

Dear Judge Ramos:

MEMO ENDORSED

The application is X granted denied

Edgardo Ramos, U.S.D.J

Dated: 3/9/2022 New York, New York

I write on behalf of my client, Alton Barnes, to respectfully request that the Court extend the deadline for securing two co-signers to Mr. Barnes's bond until Wednesday, March 16, 2022. The government consents to this request.

On March 4, 2022, Your Honor ordered that Mr. Barnes be released on his own signature and under the following bail conditions, *inter alia*: a \$50,000 personal recognizance bond to be co-signed by two financially responsible persons; travel restricted to SDNY/EDNY; surrender of all travel documents and no new applications; and home detention enforced by location monitoring technology. The remaining conditions were to be met by today, March 9, 2022. Mr. Barnes is currently in New York custody. We expect the warrant from the Bronx will be cleared by the end of the week, at the latest. Mr. Barnes's fiancé, Audrey Perez, has co-signed the personal recognizance bond. We respectfully request additional time to secure a second co-signer to the bond. Thank you for your consideration of this matter.

Respectfully submitted,

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cc: Edward Robinson, Jr., Esq., Assistant U.S. Attorney